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April 20, 2020

**VIA E-MAIL and HAND-DELIVERY**

City of Westminster  
Board of Zoning Appeals  
56 West Main Street  
Westminster, Maryland 21158

Re: Case No. 20-20  
Mid-Atlantic Lubes, LLC  
Special Exception - Service Station  
334 Gorsuch Road

Dear Board Members:

In accordance with the prehearing requirements of Section 8 of the Rules of Order and Procedure for the Board of Zoning Appeals, the following information is provided in connection with the above-referenced case.

1. The specific grounds upon which the application is based are set forth more fully in the application itself, including Westminster City Code Section 164-42(S).
2. The Applicant intends to show that there will be no adverse effects from the proposed service station at this location sufficient to overcome the presumption in favor of this use as a special exception as set forth in the City Code. The Applicant will further show that the proposal meets the technical criteria for an automobile service station under City Code Section 164-149, including market need for the public convenience and service. In support thereof, Applicant intends to introduce at hearing all or part of the materials filed with its Application.

City of Westminster  
Board of Zoning Appeals  
April 20, 2020  
Page 2

3. Randy Kazazian, Applicant's Vice President of Real Estate, will testify about the existing use and proposed use of the subject property, including the scope and nature of the facility and operations. He will produce the publication entitled "Introduction to Henley Enterprises, Inc." which further explains the operations, a copy of which is attached hereto.
4. Joshua Sharon, PE, LSIT, LEED AP, a licensed professional engineer under whose supervision the filed plans were prepared, and/or other qualified representatives from his firm, Morris & Ritchie Associates, Inc., will further testify as to the appropriateness, compatibility, consistency and feasibility of the proposed design and the lack of any appreciable adverse effects at this location.
5. Edward M. Steere, AICP, MSRE, a marketing and valuation expert with the Valbridge Property Advisors, will testify on behalf of the Applicant that there is market need for the proposed quick oil change and other light automotive maintenance services. He will distinguish the subject use from service stations which dispense fuel. He will produce a written report detailing his findings, a copy of which is attached hereto. He will also testify that the use will not cause adverse effects on surrounding property values. Mr. Steere has been qualified as an expert in real estate market analysis and evaluation, and specifically in market need for service stations, before numerous zoning bodies, including the Westminster City Board of Zoning Appeals.
6. Ken Schmid, a traffic expert with Traffic Concepts, Inc., will testify to the minimal amount of new traffic generated and the lack of any appreciable adverse effects at this location. A copy of Traffic Concept Inc.'s written report containing these findings is attached hereto.
7. We anticipate the Applicant's presentation will take about seventy-five (75) minutes.

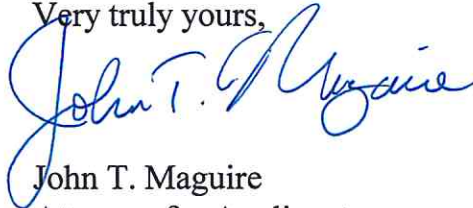
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City of Westminster  
Board of Zoning Appeals  
April 20, 2020  
Page 3

8. An original and four (4) copies of this prehearing statement, the Introduction to Henley publication, Mr. Steere's market report, Traffic Concept, Inc.'s report and the record plat for the property (Lot 1) are included herewith. There are no other parties of record.

Applicant also intends to call others as witnesses, and introduce at hearing such other drawings and materials as may become appropriate, to the extent that these matters may become relevant as a result of the course of the proceedings.

Very truly yours,



John T. Maguire  
Attorney for Applicant

JTM/pae  
Enclosure

cc: Randolph L. Kazazian III, Vice President of Real Estate (via e-mail transmission, no enclosure)  
Joshua Sharon, PE, LSIT, LEED AP (via e-mail transmission, no enclosure)  
Edward M. Steere, AICP, Managing Director (via e-mail transmission, no enclosure)  
Mark Keeley, PTP (via e-mail transmission, no enclosure)